

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GYM DOOR REPAIRS, INC., et al.	:
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Plaintiffs,	:
	:
	:
	:
	:
-against-	:
	:
YOUNG EQUIPMENTS SALES, INC., et al,	:
	:
Defendants.	:
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Case No. 15-cv-4244 (JGK) (OTW)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Declaration of Katherine J. Daniels, Esq, the Exhibits annexed thereto, the accompanying Memorandum of Law, the Court's Memorandum and Order dated September 19, 2018 granting the Defendants' motions for summary judgment (ECF 685), and all prior pleadings and proceedings had herein, Plaintiffs Gym Door Repairs, Inc. and Safe Path Systems LLC will move the court for an order, pursuant to Rule 37 and Rule 11 of the Federal Rules of Civil Procedures, imposing sanctions on Defendants Guardian, Tri-State and Carl T. Thurnau for withholding highly relevant documents in discovery and submitting false testimony to the Court and for such other and further relief as the Court may deem just and proper. Such motion shall be made before the Honorable Ona T. Wang, U.S.M.J., at the United States Courthouse, 500 Pearl Street, New York, NY, at a time to be determined by the Court.

PLEASE TAKE FURTHER NOTICE that the papers in opposition to this motion, if any, shall be served on undersigned counsel by August 7, 2019 in accordance with the briefing schedule agreed to by the parties and entered by the Court. ECF 812.

Dated: July 24, 2019
New York, New York

Respectfully submitted,

Katherine J. Daniels

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